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September 11, 2015

BY ECF

The Honorable Gregory H. Woods United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Karen Alameddene,

14 Cr. 808 (GHW)

Dear Judge Woods:

This letter is submitted on behalf of Karen Alameddene, defendant in the above-entitled case, and whom I represent by CJA appointment, and, for the reasons set forth below, respectfully requests an adjournment of Ms. Alameddine's sentencing, which is currently scheduled for September 24, 2015, at 4 p.m. This is the second request for an adjournment of the sentencing. I have spoken with Assistant United States Attorney Stanley J. Okula, Jr., who has informed me that the government does not object to this request.

The adjournment is requested because there are certain elements of Mr. Alameddine's plea agreement with the government, *i.e.*, the provision that prior to sentencing she file amended tax returns for certain years, that have been particularly time-consuming due to Mr. Alameddine's pretrial detention and lack of access to certain records. In addition, the impending Jewish Holidays next week and week thereafter have compressed counsel's schedule considerably with respect to deadlines in this and other matters (including an appellate brief recently filed in the Second Circuit, another due in the Appellate Division, First Department this month, and another due in the Ninth Circuit at the end of this month).

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As a result, it is respectfully requested that the sentencing be adjourned. After consultation with AUSA Okula, and due to other scheduled matters and travel commitments, it is requested that sentencing be re-scheduled for any time during the weeks of November 9th or November 16th.

Respectfully submitted,

Joshua L. Dratel

JLD/

cc: Stanley J. Okula, Jr.

Assistant United States Attorney